

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MEGANNE NATALE and CHELSEA
CHENG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

9199-4467 QUEBEC INC., d/b/a EARTH
RATED,

Defendant.

Case No. 2:21-cv-6775-JS-SIL

Hon. Joanna Seybert

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon: (i) the accompanying Memorandum of Law; (ii) the Declaration of Max S. Roberts, and the exhibits attached thereto (including the Parties' Class Action Settlement Agreement); and (iii) the Declaration of Gina Intrepido-Bowden of JND Legal Administration, Plaintiffs Meganne Natale and Chelsea Cheng, by and through their undersigned attorneys, will move this Court, before the Honorable Joanna Seybert, United States District Court Judge for the Eastern District of New York, at the Alfonse M. D'Amato Federal Building, 100 Federal Plaza, Courtroom 1030, Central Islip, New York 11722, for an Order, pursuant to Federal Rule of Civil Procedure 23(e): (i) granting preliminary approval of the Settlement; (ii) provisionally certifying the Settlement Class under Federal Rule of Civil Procedure 23(a) and 23(b)(3) in connection with the settlement process; (iii) appointing Bursor & Fisher, P.A. as Class Counsel; (iv) appointing Meganne Natale and Chelsea Cheng as the Class Representatives for the

Settlement Class; and (v) granting such other, further, or different relief as the court deems just and proper. A Proposed Preliminary Approval Order is submitted herewith.

Dated: March 14, 2024

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Max S. Roberts
Max S. Roberts

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**Pro Hac Vice*

Proposed Class Counsel